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NOV 29 2021

November 18, 2021

Via ECF and Email

Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Quaveon Ross*
20 Cr. 57-21 (GBD)

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: NOV 29 2021

Dear Judge Daniels:

As Your Honor is aware, I am counsel to Mr. Quaveon Ross in the above-referenced matter. This correspondence is to respectfully request an extension of time to file pretrial motions on behalf of Mr. Ross.

We previously requested — and the Court granted — an Order for the United States Department of Probation for the Southern District of New York (“Probation”) to prepare a Pre-Pleading Report to assist the parties in determining the appropriate Criminal History calculation applicable to Mr. Ross.¹ Although the parties have received Probation’s report, there are still some aspects of Mr. Ross’s criminal history that require further investigation and the parties are still engaged in plea negotiations. The resolution of these questions regarding Mr. Ross’s prior criminal history is essential because it will have a significant bearing on Mr. Ross’s final Criminal History Category and advisory Guidelines sentencing range.

¹ On September 14, 2021, the Court initially scheduled two weeks for Probation’s Pre-Pleading Report, and set the deadline for defense pretrial motions for October 7, 2021. However, the Court granted Probation an additional 45 days to complete its Pre-Pleading Report, with an unspecified extension of time for the filing of the defense’s pretrial motions.

Therefore, to allow time to complete its investigation of Mr. Ross's criminal history and for continued plea negotiations, we respectfully request an extension of time to file pretrial motions pursuant to the following schedule: defense pretrial motions to be submitted on or before February 4, 2021; the government's response to be filed on or before March 4, 2021; and defense reply to be submitted on or before March 24, 2021. Based upon my communications with A.U.S.A. Peter Davis, the Government has no objection to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc via email: A.U.S.A. Peter Davis